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June 12, 2025

Hon. Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201
VIA ECF

Re: Hernandez v. 113 Bistro Corp. et al
Docket No.: 25-cv-01614-LDH-RML

Dear Judge Levy,

This firm represents Plaintiff in the above-referenced case. I am writing on behalf of Defendants to request an extension of time to file an answer or otherwise respond to the Complaint to July 3, 2025. The current deadline for filing an answer is June 13, 2025. Plaintiff consents. This is the second request of its kind. No party will be prejudiced by this extension.

Defendants have been actively engaged in settlement negotiations with Plaintiff, and while some progress has been made, Defendants require additional time to secure legal representation. As Your Honor is aware, corporations are unable to proceed in federal court without an attorney. *See Jones v. Niagara Frontier Transp. Auth.*, 722 F.2d 20, 22 (2d Cir. 1983)

In light of this, Defendants request that this Court extend the time for Defendants to file an answer or otherwise respond to the Complaint to July 3, 2025.

Respectfully submitted,

/s/ Robert Wisniewski
Robert Wisniewski